

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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<b>In re:</b>	:	<b>CHAPTER: 13</b>
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<b>BEVERLY TYLER ,</b>	:	<b>BANKRUPTCY NO. 15-12776</b>
	:	
<b>Debtor</b>	:	
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**DEBTOR BEVERLY TYLER'S RESPONSE TO CHAPTER 13  
STANDING TRUSTEE'S MOTION FOR DISMISSAL**

Debtor Beverly Tyler, by and through her attorney, Clair M. Stewart,  
Esquire, hereby responds to Movant, Chapter 13 Standing Trustee's, Motion for  
Dismissal and in support thereof avers as follows:

1. Denied. The averments in paragraph 1 contain conclusions of law to which no response is required. To further respond, Debtor has brought or will bring all trustee payments current.
2. Denied. The averments in paragraph 1 contain conclusions of law to which no response is required.
3. Denied. The averments in paragraph 1 contain conclusions of law to which no response is required.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an order denying Movant's Motion for Dismissal.

Dated: June 28, 2020

/s/ Clair M. Stewart  
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